

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.

ROBERT GILB

Case No. 1:25-mj-502

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2025 - April 12, 2025 in the county of Hamilton & Butler in the
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*

26 U.S.C. §§ 5841, 5861, and 5871

Possession of unregistered destructive device

18 U.S.C. § 842(a)(3)(A)

Transport and receipt of explosive materials without license or permit

This criminal complaint is based on these facts:

See Affidavit

☒ Continued on the attached sheet.*Joshua Meadors*
Complainant's signatureJoshua Meadors, Special Agent, FBI
Printed name and titleSworn to before me and signed in my presence.
via FaceTime videoDate: Jun 9, 2025City and state: Cincinnati, Ohio*Karen L. Litkovitz*
Karen L. Litkovitz
United States Magistrate Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES

V.

ROBERT GILB

Case No. 1:25-mj-502

Filed Under Seal

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Joshua Meadors, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a criminal complaint against defendant Robert Gilb.

2. I am a Special Agent with the Federal Bureau of Investigation and have been since August 2023. I am currently assigned to the Cincinnati Field Office in Cincinnati, Ohio. My duties with the FBI include the investigation of alleged violations of federal criminal statutes involving terrorist activities and national security threats. I have received training and experience in numerous methods of investigation, including, but not limited to, searches and seizures, electronic and visual surveillance, witness interviews, and the use of confidential sources. As a result of my experience, I am familiar with the tactics, methods, and techniques of criminal and terrorist networks and their members, including their use of computers, cell phones, social media, email, and other forms of electronic communications, in relation to their criminal activity.

3. The information set forth in this affidavit was obtained during the course of my employment with the FBI, through personal observations, the statements of other law enforcement officials, and analysis of records. Since this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, I have not included every fact known to me concerning this investigation. I have set forth only the facts necessary to establish probable cause that federal crimes have been committed.

4. As set forth in this affidavit, there is probable cause to believe that, beginning in at least March 2025 and continuing to the present, in the Southern District of Ohio and elsewhere, the Defendant, ROBERT GILB ("GILB"): (1) possessed an unregistered firearm (destructive device) on more than one occasion in violation of 26 U.S.C. §§ 5841, 5861, and 5871; and (2) transport and receive explosive materials without a license or permit, in violation of 18 U.S.C. § 842(a)(3)(A).

PROBABLE CAUSE

Incident #1 -- April 12, 2025 -- 5086 East Miami River Rd, Cleves, Ohio

5. On April 12, 2025, at approximately 8:45 AM, Hamilton County Sheriff's Office (HCSO) was dispatched to 5086 East Miami River Rd, Cleves, OH 45002 for a report of a loud explosion. On arrival, an HCSO deputy discovered a blast crater in a small, wooded area behind the address. The deputy requested the support of others to assist with processing and collecting the major components of what appeared to be a suspected improvised explosive device (IED).

6. Your affiant was also called to assist with processing the post blast scene. Items from the blast scene included what appeared to be a threaded metal pipe, a rechargeable battery pack with an electronic board attached, a soil sample with grey colored residue, and a Rayovac 9V battery casing.

7. Following a preliminary walk through of the blast scene your affiant identified several other suspected components of the suspected IED. After the blast scene walk through, your affiant recommended a full post blast evidence search.

8. On April 12, 2025, at approximately 12:00 P.M., law enforcement conducted a post blast evidence search operation. The search yielded several additional items of evidence including what was believed to be an end cap for the metal pipe, fragments of what was believed to be a blue end cap for the metal pipe, miscellaneous plastics, remnants of a cardboard type of box, and paper towel type fragments believed to be used as tamping material for the suspected IED, and a soil sample with what appeared to be grayish residue from the blast seat.

9. All evidence collected was taken into custody and stored at the HCSO evidence control room.

10. On April 21, 2025, your affiant and other federal agents met at the HCSO to take custody of the evidence recovered from the explosive scene on April 12, 2025. All evidence items seized from the explosive scene were taken into custody by your affiant and the FBI.

Incident #2 -- March 23, 2025 -- 2958 Mustang Drive, Okeana, OH 45053

11. Your affiant met with Butler County Sheriff Office Detectives regarding two previous suspected improvised explosive device (IED) incidents in Butler County Ohio. These incidents have similar characteristics to the April 12, 2025 suspected IED incident in Cleves, OH, described above.

12. On March 23, 2025, the Butler County Sheriff's Office (BCSO) was called to the area of 2958 Mustang Drive, Okeana, OH 45053 for an explosion and neighbor dispute. On arrival, the deputies found the neighbor's standing outside arguing. All parties were separated, and the deputies spoke with witnesses, including Witness 1, Witness 2, and Witness 3. Following the scene investigation and evidence collection, Witness 2 was arrested for making threats and physical harm. On March 26, 2025, Witness 3 was located and arrested by BCSO deputies for the threats made to Witness 1 on March 23, 2025.

13. That same day, on March 23, 2025, BCSO Public Safety Bomb Technicians (PSBT) responded to conduct a post blast investigation and evidence collection. During the post blast investigation and evidence collection process, BCSO PSBT's found pieces of debris in a circular pattern in the front yard around a tree stump. The tree stump had what appeared to be powder burns because of the suspected IED being initiated.

14. The evidence collected consisted of green tape, with charring and explosive residue on the pieces, a shattered pieces of white PVC piping, with charring and explosive residue on them, and what appeared to be green paper with what was believed to be hot glue attached. The green paper was believed to be wadding material designed to pack the container and then hot glued into place to improve containment and produce a better explosion.

15. BCSO PSBT's did not find any electronic components. All components were collected and turned over to the BCSO Bomb Squad Commander for further investigation and exploration.

Incident #3 -- March 28, 2025 -- Race Lane Road

16. On March 28, 2025, Witness 3 was bonded out of the Butler County Jail by GILB in or around 4:11 A.M.

17. Later in the day on March 28, 2025, another explosion was seen and heard around Mustang Drive, Okeana Ohio. BCSO Deputies were called to 2974 Mustang Drive, Okeana, OH 45053. On arrival, BCSO Deputies contacted witnesses, who reported a loud explosion from behind 2974 Mustang Drive and near the area of Race Lane, Okeana, Ohio.

18. One witness reported seeing a white BMW prior to the explosion sitting on the roadway just past the bridge. The witness stopped and saw something smoking to the right side of the guardrail. A short time later, a loud explosion was heard, and the white BMW left the area near the bridge and was observed traveling in the direction of Okeana, Ohio.

19. Later in the day on March 28, 2025, BCSO Deputies observed the white BMW bearing Ohio license plate: KJY8645 (the "VEHICLE") traveling along Mustang Drive. The driver dropped someone off at the 2958 Mustang Drive, Okeana, OH 45053. BCSO Deputies identified the registered owner of the VEHICLE as ROBERT GILB. GILB was the same person who bonded Witness 3 out of the jail at 4:11 AM earlier that morning. BCSO Deputies further identified the VEHICLE in and around the BCSO jail before and after Witness 3 was released from custody.

20. Law enforcement responded to the scene of the explosion at Race Lane, Okeana, Ohio to conduct a post blast investigation and evidence collection. Law enforcement found evidence of what was believed to be the site of the explosion. Found at the scene was what appeared to be a blast seat beside Race Lane, Okeana, Ohio near the guardrail. The blast seat was approximately 36 inches from the road edge, 46 inches to the center of the blast seat, and 53 inches to the back edge of the blast seat. The blast seat itself was approximately 17 inches wide and 3.5

inches deep. There was a piece of gray tape, blue plastic, multicolored foil and fragments of PVC pipe found in the area.

21. Pieces of burnt and discolored PVC fragments were found inside the blast seat/crater. The crater also had a smell of burnt powder, and grayish black residue was found inside. All items were turned over to the BCSO Bomb Squad Commander for further investigation and exploration.

22. According to the Butler County Bomb Squad, the components collected from the separate incidents near Mustang Drive shared similar characteristics such as PVC pipe containers, tape attached to them in some way, initiated with some kind of hobby/time fuse.

Interviews

23. Multiple witnesses have identified ROBERT GILB as a person involved in constructing explosives, including the explosive devices at all three incidents described above.



27. GILB does not possess a license or permit for the handling or construction of explosive materials.

CONCLUSION

28. The above facts establish probable cause that to believe that ROBERT GILB has possessed an unregistered firearm (destructive device) within the Southern District of Ohio in violation of 26 U.S.C. §§ 5841, 5861, and 5871 on at least three occasions, identified as Counts 1-3 (Incidents #1-3).

29. The above facts establish probable cause that to believe that ROBERT GILB has transported and received explosive materials without a license or permit, in violation of 18 U.S.C. § 842(a)(3)(A) on at least three occasions, identified as Counts 1-3 (Incidents (#1-3)).

30. Based on the forgoing, I request that the Court issue the proposed criminal complaint, and arrest warrant for ROBERT GILB for the offenses described above.

REQUEST FOR SEALING

31. I further request that the Court order that all papers related to this application, including the affidavit, be sealed until further order of the Court. These documents discuss an ongoing criminal investigation that is neither public nor known to target of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize that investigation. Further, the subject matter of the probable cause established herein – possession of destructive devices – relates to the possession of volatile and dangerous chemicals. Premature disclosure of this affidavit and related documents could endanger law enforcement officials involved in the arrest of the defendant.

Respectfully submitted,



Joshua Meadors
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on Jun 9, 2025


Karen L. Litkovitz
United States Magistrate Judge

